

EXHIBIT 12

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE SOUTHERN DISTRICT OF NEW YORK
4 Civil Action No. 10-141 (CM) (KF)

5 MARVEL WORLDWIDE, INC.,)
6 MARVEL CHARACTERS, INC.,)
7 and MVL RIGHTS, LLC.,)

8 Plaintiffs,)

9 vs.)

10 LISA R. KIRBY, BARBARA J.)
11 KIRBY, NEAL L. KIRBY and)
12 SUSAN N. KIRBY,)

13 Defendants.)
14)
15)

16 VOLUME I

17 VIDEOTAPED DEPOSITION OF

18 ROY THOMAS

19 October 26, 2010

20 10:06 a.m.

21 Holiday Inn Express
22 Orangeburg, South Carolina

23 ANNIE O'HARA, CCR-B-2340, SC Notary
24
25

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Videographer:

Michael Arrison

- - -

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25			

1 Thomas

2 from time to time new villains or new supporting
3 characters.

4 Q. Did artists ever come up with ideas for
5 new characters?

6 A. Yes.

7 Q. Was it your understanding that part of the
8 writer's assignment was to introduce new characters
9 into a comic book series?

10 A. Yes.

11 Q. Was it your understanding that part of the
12 artist's assignment was to introduce new characters
13 into a comic book series?

14 A. Yes, anything that would be -- would
15 further the plot.

16 Q. How -- how did the artists know what to
17 draw?

18 MR. TOBEROFF: Leading; vague.

19 THE WITNESS: The artists were given a
20 story line, which might be anything from a few
21 sentences to in quite a few cases two or three
22 pages or so of a -- a sort of a --a general plot
23 line. It wasn't the exact dialogue, you know,
24 in movie script form. It was more a short story
25 synopsis of the scene. And that would tell the

1 Thomas

2 artist what the story was. Then it was his job
3 to turn that into pictures.

4 BY MS. KLEINICK:

5 Q. When you arrived at Marvel in 1965, did
6 you ever see Stan interacting with other writers or
7 artists?

8 A. Yes.

9 Q. Did you ever see Stan give a plot or
10 describe a plot to an artist?

11 A. Yes.

12 Q. To your knowledge did artists start
13 working on pages before discussing the plot or
14 synopsis with Stan or the writer?

15 A. No.

16 Q. Who decided which writer and artist would
17 work on a particular comic book or issue?

18 A. Stan.

19 Q. Were the assignments to writers given
20 orally or in writing?

21 A. Generally, orally.

22 Q. Are you aware of how assignments were
23 given to artists?

24 A. Well, orally. Sometimes Stan would be
25 talking to the person directly. Just as often or

1 Thomas

2 more often Sol Brodski as the production manager
3 would later report -- would call that person up and
4 tell them. But, of course, they were always
5 understood to be speaking for Stan, and they were.

6 Q. And just so we're clear, I just want you
7 understand, when I'm saying "assignment," I mean the
8 assignment to do a particular issue.

9 A. Uh-huh.

10 Q. Is that how you understood my question?

11 A. Yes.

12 Q. Are you aware of any instance where a
13 writer began to work on a new series or title or
14 comic book without first being assigned to it by
15 Stan?

16 A. People might come up with an idea for a
17 new series at some stage. Not -- not in the -- this
18 -- this wouldn't have happened before at least
19 about, you know, the early '70s or so. Once or
20 twice -- generally speaking, the ideas were
21 generated, you know, by someone in the office, by
22 Stan or sometimes later by me; but we were open to
23 somebody else coming in, but it wasn't anything we
24 were going around looking for or asking for.

25 Q. In the 1960s -- from 1965 to 1970, are you

1
2 aware of any instance where a writer came in and
3 actually started working on a new series before Stan
4 said: Go ahead and write the series?

5 A. No.

6 Q. Are you aware of any instances where an
7 artist began work on a comic book issue before
8 getting the assignment to do the issue from Stan?

9 A. No.

10 Q. Did writers or artists have any authority
11 to assign themselves to do an issue without prior
12 approval from Stan or Sol?

13 A. No. No.

14 Q. Are you aware of any instances where an
15 artist submitted artwork for an issue that he hadn't
16 been assigned to, like on spec?

17 A. Only new artists who were turning in
18 samples, not an established artist, not one that was
19 already -- was already doing work for Marvel.

20 Q. To your knowledge during this time period,
21 1965 to 1972, did Marvel ever buy any work created
22 on spec by freelance artists?

23 A. No. No.

24 Q. Were writers or artists ever during this
25 time period taken off a comic book issue for an

1 Thomas

2 ongoing series?

3 A. Yes.

4 Q. Whose decision was that?

5 A. Stan.

6 Q. And who had the final say on which comic
7 book stories each artist would be assigned to?

8 A. Stan Lee. He could have been technically
9 overruled by publisher Martin Goodman, if Martin
10 Goodman found there was some artist or someone he
11 really didn't like or he did like or something. But
12 as a practical matter, Goodman did not concern
13 himself with anything like that, except at sometimes
14 there were certain artists whose covers he didn't
15 think were clear enough.

16 He didn't like if Stan assigned that
17 person to do a cover. Occasionally, they had a
18 little problem about that. And, of course,
19 Goodman's word was final. But as a matter of
20 practical fact, 90-plus percent of the time it was
21 Stan's decision.

22 Q. Was there a set production schedule for
23 the Marvel comic titles back in the 1960s to early
24 '70s?

25 A. Yes.

1 Thomas

2 Q. When the writers were given an assignment,
3 were they also given a deadline to submit the --
4 let's start with the artist. When the artists were
5 given an assignment, were they given a deadline by
6 which they had to submit the finished pencils?

7 A. Yes. Either the exact date or as fast as
8 you could do it. But, yes. They were doing a
9 deadline.

10 Q. And then when the artwork went to the
11 writers, were the writers also given deadlines by
12 which they had to submit the scripts?

13 A. Yes.

14 Q. The dialogue?

15 A. Yes.

16 Q. Who set those deadlines?

17 A. They were worked out by the production
18 manager.

19 Q. That was Sol Brodski?

20 A. Yes. Through '70 or so when he quit.
21 After that by John Berpoorten.

22 Q. And who ultimately decided which books
23 were published and which books weren't published?

24 A. Well, during that period and through about
25 sometime in about '72, it was generally Martin

1 Thomas

2 Goodman. For a short period of time in the early
3 '70s it was his son Chip Goodman who had -- who was
4 -- had become publisher.

5 Q. Was the assignment process the same for
6 freelancers as it was for staff writers and artists?

7 MR. TOBEROFF: Vague.

8 THE WITNESS: I was going ask, just to --
9 if you could clarify that, just I make sure --
10 I'm sure I understand it.

11 BY MS. KLEINICK:

12 Q. Did staff artists get their assignments
13 the same way, from Stan or from Sol Brodski?

14 A. Oh, yes.

15 MR. TOBEROFF: Compound.

16 BY MS. KLEINICK:

17 Q. How did staff artists get their
18 assignments?

19 A. They were told either directly by Stan or
20 quite often by Sol Brodski in his capacity to do
21 them. Of course, if Sol assigned an artist, it was
22 because Stan wanted that artist assigned to it.
23 They would confer on it and say: Is this artist
24 available. Things of this sort.

25 Sol was the practical one who had to tell

1 Thomas

2 A. Yes. In the, you know, very earliest days
3 I wouldn't have done that; but gradually Stan let me
4 know as time went on that, you know, that I should
5 -- that I could take, you know, some of this, you
6 know, burden off. And so it was a practical fact if
7 I was sure that it was something that Stan would
8 want or at least I thought that Stan would want --
9 but I would tend for much of that time, most of that
10 time, until I was at least editor-in-chief to try to
11 check it with him if I could.

12 Q. Did -- did Stan ever -- if Stan decided.

13 Was it your understanding that Marvel had
14 the ability to use characters that were introduced
15 into its story lines by a writer and artist into a
16 different comic book story line being drawn and
17 written by a different artist and writer?

18 MR. TOBEROFF: Objection; compound;
19 leading; vague.

20 BY MS. KLEINICK:

21 Q. You can answer.

22 MR. TOBEROFF: Assumes facts.

23 THE WITNESS: If by the ability you mean
24 the right to do it, and the -- yes.

25 BY MS. KLEINICK:

1 Thomas

2 Q. Was that done -- was that done in the '60s
3 after you got there, where characters that had been
4 introduced into one comic book line title were used
5 in other comic book lines or titles?

6 MR. TOBEROFF: Same objections.

7 THE WITNESS: Yes.

8 BY MS. KLEINICK:

9 Q. You testified that the writer was
10 responsible for writing the dialogue in the comic
11 books; is that right?

12 A. Yes.

13 Q. Did artists ever suggest or submit
14 dialogue with their drawings?

15 A. Yes, the artists wrote what we call margin
16 notes in pencil that was supposed to sort of tell
17 Stan what they were thinking when they did the
18 story, since they were working on his story. And in
19 some of those notes, besides saying: This blows up
20 or something, sometimes the artist wrote either what
21 we call direct or indirect, you know, quotations.
22 Either suggested exact dialogue or approximate
23 dialogue.

24 Q. Who had the final say on what the dialogue
25 would be for the story?

1 Thomas

2 A. Well, the writer, subject to Stan.

3 Q. If a character that one -- that a writer
4 and artist first introduced into a Marvel story line
5 was going to be used in a different story line that
6 was being written by a different writer and artist,
7 did anyone have to go back and consult with the
8 original writer and artist to use that character?

9 MR. TOBEROFF: Incomplete hypothetical.

10 THE WITNESS: The person who made all
11 those decisions was Stan. You didn't have to
12 consult with the other person. As a matter of,
13 you know, courtesy or information, you might do
14 it; but it was not required.

15 BY MS. KLEINICK:

16 Q. Who decided which artist would do a cover
17 for a particular issue?

18 A. Stan.

19 Q. Were the covers reviewed by anyone before
20 they were published?

21 A. Well, they were reviewed by Stan, because
22 after they were drawn he wrote the cover copy and
23 then looked it over again after -- after the cover
24 was inked, either by the same artist or a different
25 one.

1 Thomas

2 Then it was -- then they were reviewed --
3 they were all reviewed eventually by Martin Goodman
4 as publisher, and very briefly as I said by Chip
5 Goodman, and, of course, from '72 to '74 by Stan
6 himself as publisher.

7 Q. From the time you arrived at Marvel from
8 '65 to '72 were changes ever made to the covers that
9 had been submitted by artists?

10 A. Yes.

11 Q. Who would make those changes?

12 A. That depended upon circumstances. If the
13 original artist was there or if there was time to
14 either have him come in or to mail it or send it to
15 him, he might be asked to make the changes.
16 Sometimes, either if it was a minor change or if the
17 deadline needs were great or for any other reason,
18 Stan -- especially in consulting with the production
19 manager who had the responsibility with the schedule
20 -- would decide, you know, that it should be done by
21 a staff artist or perhaps a visiting freelance
22 artist who just came in. It really depended on what
23 the change was and what the time was.

24 Q. And if an artist's work -- if an artist's
25 work required that changes be made, would the artist

1 Thomas

2 have been paid for the original work that they
3 submitted?

4 MR. TOBEROFF: Incomplete hypothetical.

5 THE WITNESS: Yes, the artist would have
6 been paid.

7 BY MS. KLEINICK:

8 Q. Between '65 and at least '72 you were paid
9 both a salary and for your editorial work and a page
10 rate for your the freelance writing that you did?

11 A. Right.

12 Q. How often were you paid?

13 A. That's something I am a little vague
14 about. I know that the salary checks were more
15 frequent than the freelance checks, but I'm -- they
16 both came on Fridays but not always at the same
17 time. I'm just not certain if we were paid -- I --
18 I feel we were probably paid salary checks every
19 week, and maybe the freelance was every other week;
20 but I'm not 100 percent sure of that. It all kind
21 of fades together after a while.

22 Q. Who decided what the page rates for
23 freelance writers and artists would be?

24 A. Well, Stan had the individual
25 responsibility; but, of course, it was subject to

1 Thomas

2 Q. Do you recall whether or not there was any
3 legend or stamp on the checks that were issued by
4 Marvel to you for your freelance work at the time
5 you first started working for Marvel in the 1960s?

6 MR. TOBEROFF: Leading; assumes facts.

7 THE WITNESS: Yes, there were stamped
8 legends or paragraphs on the back of the checks.
9 I cannot remember offhand if they were on both
10 the freelance and the staff checks. I know they
11 were on the freelance checks, but I don't recall
12 whether they were on the others. Because I
13 never -- you know, after a while you just stop
14 paying attention to those. You just sign the
15 check and that was it.

16 BY MS. KLEINICK:

17 Q. Do you recall whether the first freelance
18 checks you received from Marvel had a legend or
19 stamp on the check?

20 A. I know that all the ones I remember did.
21 And I remember back pretty early, but, you know, I
22 couldn't swear the very first one did; but it, you
23 know -- you know, it seemed like it was an ongoing
24 policy.

25 Q. Do you recall what the legend said?

1 Thomas

2 A. Only in a general sense. I, of course,
3 read it; but, basically, it was saying that the
4 company had -- owned all the -- the copyrights and
5 all of the rights to the material for which I was
6 being -- material or work for which I was being
7 paid.

8 Q. And was that the same type of language
9 that you recall seeing on all of the checks that had
10 the legends on them?

11 A. Whenever I read it -- the exact wording
12 may have changed slightly from time, but it was
13 always, you know, words to that effect.

14 Q. Do you know whether the checks that were
15 given to other writers or freelance artists also had
16 a legend or a stamp on them?

17 A. I know that they did. I didn't see
18 everyone's checks, of course; but -- and it was my
19 understanding that they did.

20 Q. Did you ever discuss the check legends
21 with any of the other freelance writers or artists?

22 A. I don't recall specific, you know,
23 conversations in detail. But I know that from time
24 to time we would discuss them, because at first I
25 was a little puzzled seeing all this on here. You

1 Thomas

2 have been about two weeks or so.

3 Q. You testified that there was a script that
4 you wrote, I think it was on an Ironman script that
5 Stan didn't like and revised significantly?

6 A. Yes.

7 Q. Is that right?

8 A. Yes. He rewrote about 50 percent of it.

9 Q. Were you paid for the pages that you
10 submitted for that script?

11 A. That was one of the ones that I was doing
12 as part of the staff writer thing during those first
13 few weeks, so I wasn't paid separately. It was
14 counted as part of my staff writer salary, so I was
15 paid in that sense, for that and the Dr. Strange.
16 But I think -- I think those. I know Ironman was
17 and I think Dr. Strange's were all part of the
18 staff's salary.

19 Q. Were there any materials that you
20 submitted in your freelance capacity that were
21 modified by Stan?

22 A. Yes.

23 Q. Were you still paid for the pages that you
24 submitted?

25 A. Yes.

1 Thomas

2 were -- artists submitted their finished pencils to
3 either Stan or to Sol for approval; is that right?

4 MR. TOBEROFF: Misstates testimony.

5 THE WITNESS: Yes. He turned it in
6 directly to Stan or Sol Brodski, with the idea
7 that Sol would show them to Stan.

8 BY MS. KLEINICK:

9 Q. Did -- did artwork that was submitted by
10 freelance artists from the time that you got there
11 in 1965 through the early '70s need to be approved
12 by Stan or Sol before it got published?

13 A. Yes, it had to be approved by Stan. Sol
14 didn't really have the authority to approve anything
15 unless he felt that Stan -- he was always acting on
16 Stan's authority, but he wouldn't have approved
17 anything on his own authority.

18 Q. Was Jack Kirby required during this time
19 period to submit his artwork to Stan for approval?

20 MR. TOBEROFF: Leading.

21 THE WITNESS: Yes. It was turned in to
22 Stan for -- for him as editor, to look at, to do
23 whatever he wanted to do.

24 BY MS. KLEINICK:

25 Q. Did Stan or any other editor ever make

1 Thomas

2 changes to the artwork that Kirby submitted for
3 publication?

4 A. Yes.

5 Q. Did Stan or any other editor ever ask
6 Kirby to redo anything that he had submitted to your
7 knowledge?

8 MR. TOBEROFF: Leading.

9 THE WITNESS: Yes. They did. It was not
10 a usual occurrence, but from time to time
11 something had to be redone.

12 BY MS. KLEINICK:

13 Q. In the instances where changes -- where
14 Stan determined that changes should be made to the
15 artwork that Kirby had submitted for publication by
16 Marvel, would Stan typically have Kirby make the
17 changes or --

18 A. Are you finished with the question?

19 Q. Would Stan typically have Kirby make the
20 changes?

21 MR. TOBEROFF: Assumes facts; leading;
22 compound.

23 THE WITNESS: He would -- he might have
24 Jack make the change, if Jack were there and
25 available or if there was plenty of time. He

1 Thomas

2 Jack Kirby submitted on any of the stories that he
3 was working on?

4 A. On many of them.

5 Q. Do you ever recall seeing any notes or
6 suggested dialogue that Mr. Kirby included on the
7 artwork pages he turned in?

8 A. Yes. Pretty invariably, some sort of
9 notes -- whether some of it suggested dialogue, some
10 of it was other comments or plot things.

11 Q. And do you know on the issues where Stan
12 was the writer whether he -- what he would do with
13 the notes and dialogue that Kirby put in the
14 margins?

15 A. He would utilize them to make sure that he
16 understood fully what -- what was going on based on
17 Jack's expansion of the plot. And then he would --
18 as far as the dialogue, he would utilize little
19 snippets of it, or he would make up his own, as far
20 as I could tell when I was examining it and when I
21 was proofreading and marks were often still there.
22 He used very little of the exact wording.

23 Q. I would like to mark as Thomas Exhibit --
24 I guess we are up to 15 -- a document bearing
25 production number Marvel 15988 through 16125.

C E R T I F I C A T E

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages 1 through 196 represent a true, complete, and correct transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in any way interested in the result of said case.

This, the 8th day of November, 2010.



ANNIE O'HARA, CCR-B-2340

ERRATA SHEET

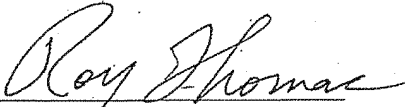
Transcript of Roy Thomas
October 13, 2010 and October 14, 2010

<u>Page</u>	<u>Line</u>	<u>Per Transcript</u>	<u>Should Be</u>	<u>Reason</u>
10	16	various	varies	Transcription error
25	13 and 14 (and in passim throughout transcript)	Brodski	Brodsky	Spelling error
30	8	I remember calling myself	I don't remember calling myself	Transcription error
33	19	Berpoorten	Verpoorten	Spelling error
35	14	increasing	increasingly	Clarification
43	5	newspaper script that	newspaper strip that	Transcription error
45	8	Milly	Millie	Spelling error
45	10	Heady	Hedy	Spelling error
46	17	Ironman	Iron Man	Spelling error
46	18	we wrote	he wrote	Transcription error
50	15	"dialogue for"	"dialogue" for	Transcription error
76	20	comics code	Comics Code	Transcription error
87	7-8	Comics Book	Comix Book	Spelling error
88	22	Dennis	Denis	Spelling error
92	6	Magazine fancy	magazine – "fanzine"	Transcription error

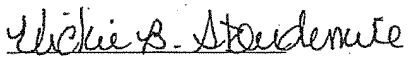
<u>Page</u>	<u>Line</u>	<u>Per Transcript</u>	<u>Should Be</u>	<u>Reason</u>
93	17-18	I'd like to direct your attention to page 9 of the article, the window that starts off "Synopsis for Fantastic Four No. 8." And there's a newspaper Puppet Master. Do you see that?	I'd like to direct your attention to page 9 of the article, the window that starts off "Synopsis for Fantastic Four No. 8. Prisoners of Puppet Master." Do you see that?	Transcription error
95	13	Evenier	Evanier	Spelling error
109	17	surfer	Surfer	Spelling error
119	24	Coleman	Colan	Transcription error
138	17-22	Oh Romita. I had some communications with John Romita. I don't think I did, unless I would have mentioned it in passing sometime in an e-mail, but I don't recall doing that. We have very little communication and so forth. There was certainly nothing substantive.	I have not had any communications with John Romita about this case.	Clarification
152	21	gone	gotten	Transcription error
158	9	you say that at a minimum would be a co-writer and	you say that at a minimum you would be a co-writer and	Transcription error
179	8-9	Carmen Empitimo	Carmine Infantino	Spelling error
191	5	regretted	regret	Transcription error

<u>Page</u>	<u>Line</u>	<u>Per Transcript</u>	<u>Should Be</u>	<u>Reason</u>
195	3	Jerry	Gerry	Spelling error
196	15	Jerry	Gerry	Spelling error
218	17	originated	originate	Transcription error
224	18	including the two I dialogue, did not have any	including the two I dialogued, I did not have any	Transcription error
232	3	don't	didn't	Transcription error
233	18	balloon	Balloons	Transcription error
237	14-16	So in that case, as far as I know, Jack did all the plotting and was credited, you know, and we all knew it.	So in that case, as far as I know, Jack did the plotting and, though he wasn't specifically credited with the plot, we knew he had done it.	Clarification
238	3	Well, -- yes.	Well, -- no. It was after Jack left Marvel in 1970.	Clarification
239	19	House Roy	Houseroy	Spelling error
240	16	do that	get at	Transcription error
241	3	enjoined	enjoyed	Transcription error
241	5	statement	sometimes	Transcription error
241	6	deprecating	deprecatingly	Transcription error
242	8-10	stories that were at alternate realty, that took off from a certain point in borrowed continuity, and developed story almost in a	stories that were set in an alternate reality, that took off from a certain point in normal continuity, and developed a story almost in a	Transcription error

<u>Page</u>	<u>Line</u>	<u>Per Transcript</u>	<u>Should Be</u>	<u>Reason</u>
246	21	Dan	Dann	Spelling error
253	3-5	pursuant to a Xerox, at my request, to him. And the Xerox that said it was on the way; that then this followed.	pursuant to a fax, at my request, to him. And the fax that said it was on the way; that then this followed.	Clarification
253	11-12	I had contacted Stan and asked him if he had it. Because, although it had been published once or twice, I wanted to publish it in Alter Ego and kind of do an analysis of it. So he sent me a Xerox saying it would have to be followed by mail, because it was just too dim to send a good Xerox of it.	I had contacted Stan by and asked him if he had it. Because, although it had been published once or twice, I wanted to publish it in Alter Ego and kind of do an analysis of it. So he sent me a fax saying it would have to be followed by mail, because it was just too dim to send a good Xerox of it.	Clarification
277	8	Meade	Romita	Transcription error
279	17	the seventies	the sixties	Clarification
280	16	Yes, I furnished some plot,	Yes, I furnished some plots,	Transcription error
291	14	He called Sol Brodsky, you know, a	He called in Sol Brodsky, you know, a	Transcription error
293	13	are.	were.	Transcription error
295	5	his work, and Stan didn't feel that he needed	his work, and Stan didn't feel that they needed	Clarification


Roy Thomas

Sworn to before me
this 2nd day of December, 2010


Notary Public